NRG Energy, Inc.

Statement of Greenhouse Gas Emissions

For the Year Ended December 31, 2024

(With Independent Accountants' Review Report Thereon)

KPMG LLP
Suite 800
1225 17th Street
Denver, CO 80202-5598

Independent Accountants' Review Report

To the Board of Directors
NRG Energy, Inc.:

Report on the accompanying Statement of Greenhouse Gas Emissions

Conclusion

We have reviewed whether the Statement of Greenhouse Gas (GHG) Emissions and the related notes (Statement of Greenhouse Gas Emissions) of NRG Energy, Inc. (the Company) for the year ended December 31, 2024 has been prepared in accordance with the corresponding criteria set forth in Note 2 (the Criteria).

Based on our review, we are not aware of any material modifications that should be made to the Statement of Greenhouse Gas Emissions for the year ended December 31, 2024 in order for it to be prepared in accordance with the Criteria.

Our conclusion on the Statement of Greenhouse Gas Emissions does not extend to any other information that accompanies or contains the Statement of Greenhouse Gas Emissions and our report.

Basis for conclusion

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants in the versions of AT-C section 105, *Concepts Common to All Attestation Engagements*, and AT-C section 210, *Review Engagements* that are applicable as of the date of our review. We are required to be independent and to meet our other ethical requirements in accordance with relevant ethical requirements related to the engagement. We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

Other matter

Management has elected to reference information on websites or other forms of interactive data outside the Statement of Greenhouse Gas Emissions to provide additional information for the users of the report. The information on these websites or the other forms of interactive data has not been subjected to any of our review procedures, and accordingly we do not express an opinion, conclusion or any other form of assurance on such other information. Our conclusion is not modified in respect of this matter.

Responsibilities for the Statement of Greenhouse Gas Emissions

Management of the Company is responsible for:

- designing, implementing and maintaining internal control relevant to the preparation of the Statement of Greenhouse Gas Emissions such that it is free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the Statement of Greenhouse Gas Emissions and appropriately referring to or describing the criteria used; and
- preparing the Statement of Greenhouse Gas Emissions in accordance with the Criteria.

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Inherent limitations in preparing the Statement of Greenhouse Gas Emissions

As described in Note 1 "Estimation Uncertainties" of the Statement of Greenhouse Gas Emissions, the preparation of the Statement of Greenhouse Gas Emissions requires the Company's management to interpret the Measurement Criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. Emission and consumption data included in the Statement of Greenhouse Gas Emissions are subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection by management of different, but acceptable measurement methods, data or assumptions could have resulted in materially different amounts being reported. The precision of different measurement techniques may also vary.

Our responsibilities

The attestation standards established by the American Institute of Certified Public Accountants require us to:

- plan and perform the review to obtain limited assurance about whether any material modifications should be made to the Statement of Greenhouse Gas Emissions in order for it to be prepared in accordance with the Criteria; and
- express a conclusion on the Statement of Greenhouse Gas Emissions based on our review.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the Statement of Greenhouse Gas Emissions and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, the procedures we performed primarily consisted of:

- inquiring of management to obtain an understanding of the methodologies applied to measure and evaluate the GHG emissions;
- evaluating management's application of the methodologies;
- inspecting supporting documentation for a haphazard selection of activity data;
- considering the appropriateness of emission factors used and estimates;
- recalculating a selection of the GHG emissions based on the criteria; and
- performing analytical procedures.

The procedures performed in a review vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether the subject matter information is prepared in accordance with the criteria, in all material respects, in order to express an opinion. Because of the limited nature of the engagement, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an examination been performed.

KPMG LLP

Denver, Colorado
May 14, 2025

NRG Energy, Inc.
Statement of Greenhouse Gas Emissions
For the Year Ended December 31, 2024

Description	Metric Tons Carbon Dioxide Equivalent (CO_2e)
Scope 1 Greenhouse Gas Emissions	25,035,662
Scope 2 Greenhouse Gas Emissions (location-based)	105,321
Scope 3, Category 6 Business Travel Greenhouse Gas Emissions	10,603

See accompanying Notes to Statement of Greenhouse Gas Emissions.

NRG Energy, Inc.
Statement of Greenhouse Gas Emissions
For the Year Ended December 31, 2024

Note 1: The Company

Organization

NRG Energy, Inc., or NRG or the Company, is a leading energy and smart home company powering a brighter, smarter future. The Company delivers gas, electricity, and smart home solutions to approximately 8 million residential customers (comprised of 6 million retail energy customers and 2 million smart home customers) in addition to large commercial and industrial, hyperscaler, and wholesale customers. Across the U.S. and Canada, NRG is redefining customers' experience with energy under brand names such as NRG, Reliant, Direct Energy, Green Mountain Energy, and Vivint. As of December 31, 2024, the Company's core power and natural gas business consists of approximately 13 gigawatts of competitive power generation, primarily in Texas, and a natural gas portfolio that serves approximately 1,800 million dekatherms annually.

Basis of Presentation

The Statement of Greenhouse Gas Emissions has been prepared based on a calendar reporting year that is the same as NRG's financial reporting period.

Organizational Boundary

NRG employs a hybrid of operational control and equity share approach to account for its Greenhouse Gas (GHG) emissions. The hybrid approach means that emissions from sources that are owned or controlled by NRG as of December 31, 2024 are fully accounted for by the Company. Emissions from all jointly-owned electric generating facilities located in North America are allocated based on the Company's equity share of ownership as of December 31, 2024. Acquisitions and dispositions during the reporting year have been evaluated for inclusion or exclusion in the organizational boundary following the guidance in the World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI) Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard-Revised Edition[1].

Estimation Uncertainties

The preparation of the Statement of Greenhouse Gas Emissions requires the Company to interpret the Measurement Criteria (see Note 2), make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. Emission and consumption data included in the Statement of Greenhouse Gas Emissions are subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection by management of different but acceptable measurement methods, data, or assumptions could have resulted in materially different amounts being reported. The precision of different measurement techniques may also vary.

Note 2: Measurement Criteria

Greenhouse Gas Emissions

The Statement of Greenhouse Gas Emissions includes the following greenhouse gases: carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) emissions have been omitted as they are not material sources of greenhouse gases for the Company.

All GHG emission data are presented in metric tons of carbon dioxide equivalent (CO_2e). GHG emissions are calculated using the Global Warming Potentials (GWP) for CO_2, CH_4, and N_2O from the International Panel on Climate Change (IPCC) *Fifth Assessment Report*[2].

Scope 1

Scope 1 GHG emissions represent GHG emissions that occur from fuel combustion in boilers, turbines, and engines used to generate wholesale electric power at facilities within the organizational boundary. The Scope 1 GHG emissions are measured using methods specified by the Environmental Protection Agency within the Code of Federal Regulations[3].

GHG emissions from combustion of fossil fuels used for other activities or equipment, such as auxiliary boilers, starter engines, generators, company fleet vehicles, and office and warehouse facility emissions are not included in Scope 1 inventory at this time as the associated emissions are immaterial.

Scope 2

Scope 2 GHG emissions represent purchased electricity consumed by the Company and are measured using the WBCSD and WRI GHG Protocol Scope 2 Guidance[4]. Scope 2 GHG emissions are measured using a location-based method. The Company's purchased electricity from United States-based electricity distribution utilities is multiplied by appropriate regional emission factors, which are sourced from the EPA Emissions & Generation Resource Integrated Database (eGRID) Summary Data[5]. The Company's purchased electricity from Canadian-based electricity distribution utilities is multiplied by the Government of Canada's electricity consumption intensity values[6].

A facility's electricity consumption is derived from metered electricity purchases from North American electricity distribution utilities. When utility metering and invoices are not available for plant locations, estimates are made using the facility's historical electricity consumption. If utility metering and invoices are not available for office or warehouse locations, consumption is estimated using the United States Energy Information Administration (EIA) Commercial Buildings Energy Consumption Survey (CBECS)[7], based on location type and facility size. Historical electricity consumption, if available, may be used to refine estimates, particularly when considering seasonality.

Scope 3, Category 6: Business Travel

The Company's Business Travel emissions are measured using the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard[8]. Emissions from business travel includes business-related travel activities with a travel start date within the reporting year and booked through NRG's third-party travel agency. Travel booked outside the travel agency is excluded, and, as such, taxi, ride-share services, and business travel in employee-owned vehicles are not included in the calculation. Conversely, non-employee travel may, on occasion, be booked through the Company's travel agency and included in Business Travel emissions. The impact of the travel booked outside the travel agency and the non-employee travel booked through the travel agency is immaterial.

NRG's third-party travel agency provides the total miles of airplane and train travel and total nights of hotel stays. While car rentals are booked through the travel agency, miles driven are provided directly by the rental car agency. For travel originating from the United States, emission factors are sourced from the GHG Emission Factors Hub[9], and for travel originating internationally, emission factors are sourced from United Kingdom Department for Environment, Food and Rural Affairs (DEFRA)[10]. To refine the emission factors, flights are sorted by distance and car rentals are sorted by car type. Hotel stay emissions are calculated using nights of stay by country and emission factors by country from the Cornell University Hotel Sustainability Benchmarking Index[11].

Note 3: Subsequent Events

On April 10, 2025, NRG acquired all of the ownership interests of six natural gas-fired generation assets from Rockland Capital, LLC. On May 12, 2025, the Company entered into a definitive agreement with LS Power to acquire a portfolio of natural gas-fired generation facilities and a commercial & industrial virtual power plant platform. The Company has not included these events in its emissions calculations in this Statement of Greenhouse Gas Emissions.

[1] GHG Protocol: A Corporate Accounting and Reporting Standard-Revised Edition, March 2004: http://www.ghgprotocol.org/sites/default/files/ghgp/standards/ghg-protocol-revised.pdf
[2] International Panel on Climate Change Fifth Assessment Report: https://www.ipcc.ch/assessment-report/ar5/
[3] Code of Federal Regulations Title 40, Part 98, May 14, 2024 update
[4] GHG Protocol Scope 2 Guidance, Feb. 2020 update, from https://ghgprotocol.org/scope-2-guidance
[5] US EPA eGRID 2023 Summary Tables Rev 1, last updated January 17, 2025, Table 1, from https://www.epa.gov/egrid/summary-data
[6] Canada Environment and Climate Change: Emission Factors and Reference Values Version 1.1 from May 2024, Table 5.1, from https://publications.gc.ca/collections/collection_2024/eccc/En84-294-2024-eng.pdf
[7] EIA CBECS Survey, 2018, Table C21, from https://www.eia.gov/consumption/commercial/data/2018/index.php?view=consumption
[8] Corporate Value Chain (Scope 3) Accounting and Reporting Standard, May 2013 update, from https://ghgprotocol.org/corporate-value-chain-scope-3-standard
[9] EPA 2024 GHG Emission Factors Hub. Table 10. Last updated January 15, 2025, from https://www.epa.gov/system/files/documents/2025-01/ghg-emission-factors-hub-2025.pdf
[10] DEFRA Conversion Factors 2024, from https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024
[11] Hotel Sustainability Benchmarking Index 2024v2, from https://ecommons.cornell.edu/handle/1813/109990